

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN JAMES PEREZ,

Defendant.

INDICTMENT *CR14-252 JNE/TNL*

) 18 U.S.C. § 2251(a)

) 18 U.S.C. § 2251(e)

) 18 U.S.C. § 2253(a)

) 18 U.S.C. § 2423(b)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

In or about December 2013, in the State and District of Minnesota, the defendant,

JONATHAN JAMES PEREZ,

having previously been convicted pursuant to the laws of the State of Texas relating to the abusive sexual contact of a minor, namely a conviction for Solicitation to Commit Aggravated Sexual Assault of a Child, did knowingly employ, use, persuade, induce, entice, and coerce John Doe, a minor child, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including, but not limited to, the following digital image files: "mp4 josiah"; "MPG 1925.mp4"; and "MPG 1926.mp4"; in violation of Title 18, United States Code, Sections 2251(a) and (e).

SCANNED

AUG 05 2014

U.S. DISTRICT COURT ST. PAUL

U.S. v. Jonathan James Perez

COUNT 2

(Interstate Travel to Engage in Illicit Sexual Conduct)

In or about December 2013, in the State and District of Minnesota, the defendant,

JONATHAN JAMES PEREZ,

did knowingly travel in interstate commerce from El Paso, Texas to Rochester, Minnesota, for the purpose of engaging in illicit sexual conduct, to wit: a sexual act with a person who was under the age of eighteen years, such sexual act being defined in 18 U.S.C. § 2246, and such sexual act was in violation of Chapter 109A, had the sexual act occurred in the special maritime and territorial jurisdiction of the United States, in violation of Title 18, United States Code, Section 2423(b).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

U.S. v. Jonathan James Perez

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property;

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b). All in violation of Title 18, United States Code, Sections 2251(a) and (e)

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON